

Data Submitted (UTC 11): 3/16/2020 7:00:00 AM

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Comments:

Kooskia Ranger Station

c/o Dan Fabbi

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Sent via e-[auto-markup:Request for Information]mail[auto-markup end] to: comments-northern-nezperce-moose-creek@usda.gov

March 16, 2020

Subject: Green Horse Proposed Action

Dear Mr. Fabi:

Since 1973, the Idaho Conservation League has been Idaho's voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest statebased conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting human health and the environment.

I am writing on behalf of the Idaho Conservation League to comment on the proposed action for the Green Horse Project. It appears that the Forest Service intends to apply concepts of ecological forestry, which we appreciate. As outlined in our attached comments, aggressive regeneration harvest can negatively affect wildlife. Applying concepts of 'ecological forestry' can help ameliorate these effects while enabling progress to be made toward forest restoration goals.

We also encourage the Forest Service to consider watershed restoration opportunities within the project area, such as road decommissioning. In particular, we encourage the Forest Service to take a look at Horse Creek. This watershed is classified as 'functioning at risk' in the Watershed Condition Framework. Horse Creek is a tributary to Meadow Creek, which is critically important from a fisheries perspective. Any opportunities to improve water quality and aquatic habitat in Horse Creek would also benefit Meadow Creek.

Additional comments and considerations may be found in the attached comments. We look forward to reviewing your environmental effects analysis. In the meantime, please don't hesitate to contact me if you have any questions about our comments.

Sincerely,

Brad Smith

North Idaho Director

Green Horse Proposed Action

Silvicultural prescriptions

[comment:6-1(142 Timber Mgmt)]The proposed action includes more than 1,500 acres of regeneration harvest. While regeneration harvest can be an important tool to alter forest composition and structure and achieve desired forest conditions on moist sites, regeneration harvest can also negatively affect wildlife habitat. Johnson and Franklin (2009) developed a set of recommendations to ameliorate these concerns. They advocate for the retention of pockets or "aggregates" within target treatment stands. In the treated areas between aggregates, Johnson and Franklin also recommend dispersed retention of individual leave trees, coarse woody debris, snags, and small clusters of trees. While the primary objective of their recommendations is to ensure that important structural components of wildlife habitat are retained following timber harvest, their recommendations may also satisfy visual quality objectives through the creation of more natural looking openings.

Based on pilot projects implemented on the west slope of the Cascades, Johnson and Franklin recommend that foresters retain approximately 30% of the original stand in aggregates, varying in size from 0.5 to 5 acres. Larger aggregates are encouraged where unit size and yarding methods permit. Aggregates should be centered on mature or old growth trees, concentrations of coarse woody debris, snags, seeps, rock outcroppings, or other unique structural features. To the extent practical, aggregates should include an overall representation of the tree species that were present in the original stand.

Retained aggregates should be well distributed throughout the treatment unit. The scoping notice indicates that retention objectives would first be met by untreated ground that is within riparian habitat conservation areas (page 4). Johnson and Franklin suggest that it is okay to count riparian habitat conservation areas (RHCAs) toward as much as 30% of the retention target when RHCAs [auto-markup:Request for Comment Extension]extend[auto-markup end] into harvest units. However, credit for riparian buffers should be minimized because RHCAs are spatially concentrated and tend not to be well distributed in treatment areas. Ecological forestry objectives are not met when large areas are created that lack in retention.

In the treated areas between aggregates, additional retention should also occur as individual leave trees, coarse woody debris, snags, and small clusters of trees. Large or mature trees are ideal candidates. Retention of individual trees is intended to aid in the recruitment of snags, [auto-markup:Sensitive Resource]nesting[auto-markup end] habitat and coarse woody debris.

Following harvest, treated areas should be broadcast burned. Aggregates should remain unburned. The mortality of some individual leave trees or clusters of trees is acceptable as this will serve to create snags for species that are associated with or benefit from these structural features.

Finally, the edges of treatment units should be irregularly thinned. Sharp unit edges result in a phenomenon known as the "edge effect", which is not only visually unappealing, but sharp edges are also not idea for wildlife.

It appears that the Forest Service intends to apply these concepts to the stands targeted for regeneration, which we appreciate. Several times in the scoping notice, the Forest Service refers to required retention levels (For example, see the second sentence under the section describing regeneration harvest.). However, we could not find any information in the document describing what the required retention levels actually are. It's unclear if the retention levels are based on suggestions found in the scientific literature or if the required retention levels are associated with the Forest Plan. In any case, the Forest Service should clearly state what the required retention levels are and where they come from.

The Forest Service states that long-lived early seral species will be given preference for retention where

they are available (page 4). Other species may be retained "provided that the trees are relatively free of insect and disease." The Forest Service notes that "[g]enerally, trees with heavy (67-90% of foliage missing) or severe (greater than 90% of foliage missing) defoliation do not recover." (page 13). Is it safe to assume that trees with 67% or more defoliation will be removed? The Forest Service should more clearly define what "relatively free of insect and disease" means in terms of what will be retained and what will be removed.[comment end]

Live tree retention

[comment:6-2(142 Timber Mgmt)]While the retention of entire stands of old growth trees is important for ecological reasons, so is the retention of individual mature trees within stands or portions of stands that are targeted for silvicultural treatments. The Forest Service understandably intends to focus on the retention of any long-lived early seral species that occur in treatment areas. However, retention of large, mature, shade tolerant species may also be desirable from a wildlife standpoint. Large, mature trees can provide habitat for [auto-markup:Sensitive Resource]nesting[auto-markup end] and aid in the recruitment of snags, coarse woody debris, and other beneficial structural components.

This objective is typically accomplished by setting a limit on the diameter of trees that may be cut and harvested. However, age limits are also gaining traction in the scientific literature (e.g. Johnson and Franklin 2009). While no single diameter or age can define these biological legacies, diameter and age limits can help facilitate the conservation of the most desirable leave trees in forest stands that are slated for treatment.

In the forests of north Idaho, diameter and age limits are probably most appropriately derived from Green et al. (2011), who use a minimum age of 150 years in their definition of old growth trees (Lodgepole pine is a notable exception, with a minimum age of 120 years.). Some foresters reject age limits as a practical matter. However, Johnson and Franklin (2009) describe how to make age limits work (see pages 26 and 27).

If the application of an age limit continues to be problematic, then we suggest using species-specific diameter limits for live tree retention. We suggest using the following diameter limits, which come from the old growth criteria for the North Idaho Zone described by Green et al. (2011):

- Retain all ponderosa pine, Douglas-fir, grand fir, western hemlock, white pine, and western larch that are 21 inches dbh or greater.
 - Retain all western red cedar that are 25 inches dbh or greater.
 - Retain all lodgepole pine that are 13 inches dbh or greater.
 - Retain all subalpine fir, Engelmann spruce and mountain hemlock that are 17 inches dbh or greater.
- [comment end]

Snags

[comment:6-3(143 Wildlife/Animals Mgmt)]Where dead trees or snags exist, they should be retained for wildlife benefit. In this instance, age thresholds and diameter limits should not be applied. While several sources (Thomas 1979, Raphael and White 1984, Zarnowitz and Manuwal 1985, Morrison and Raphael 1993) provide recommendations for the amount of snags to retain in unburned forests, why not retain all snags unless they pose a safety risk? Dead trees tend to provide little or no economic value, but they are of great benefit to wildlife.[comment end]

Coarse woody debris

[comment:6-4(143 Wildlife/Animals Mgmt)]The retention of on-site, coarse woody debris is important for a variety of reasons. There are a number of species that benefit from logs, trees, boles, and other large pieces of wood lying on the ground. Coarse wood debris also reduces erosion by trapping sediment and run-off and helps maintain soil nutrient capital. The microclimates created by coarse woody debris are often critical to the regeneration of desired trees and vegetation because the removal of overstory trees

during logging operations increases solar radiation and reduces soil moisture. We recommend retention of the following amounts of on-site coarse woody debris:

*see table in letter on page 5**[comment end]

Old growth

[comment:6-5(142 Timber Mgmt)]We appreciate the fact that no old growth will be harvested (as defined by Green et al. 2011). We also encourage the Forest Service to identify and conserve recruitment old growth given that the amount and distribution of old growth forest types are generally underrepresented on the Nez Perce-Clearwater National Forests compared to historical conditions.[comment end]

Roadside salvage in roadless areas

[comment:6-6(220 Laws, Policies, Courts)]Approximately 180 acres of roadside salvage in Idaho Roadless Areas is proposed to remove dead and dying trees within falling or striking distance of the road. Its not clear which roads the Forest Service is talking about, but it looks like the roadside units in roadless areas are adjacent to roads 2116, 356, 464A, and 2103. The Forest Service should clarify where the roadside salvage units are located, which roads and roadless areas are implicated, and describe how the proposed treatments are consistent with the Idaho Roadless Rule. The Forest Service should also clarify if the associated roads are open to public travel or if the roads are only open to administrative use. We encourage the Forest Service to limit roadside salvage in roadless areas to units that are adjacent to roads that are open to public travel. We encourage the Forest Service to drop units in roadless areas that are adjacent to roads that are only open to administrative use. Particularly where road conditions are currently impassible to vehicular use[comment end].

Post-fire salvage

[comment:6-7(142 Timber Mgmt)]It does not appear that any of the proposed treatment units would entail post-fire salvage logging. However, the Forest Service should clearly indicate whether or not an post-fire salvage would occur. It looks like none of the units were affected by the Wash Fire, but we are not sure. [comment end]

Watershed Condition Framework

[comment:6-8(132 Water, Watershed Mgmt)]According to the Watershed Condition Framework (2011), the Horse Creek Watershed is "functioning at risk". The Forest Service should discuss the significance of this classification and the Watershed Condition Framework in the environmental analysis. Furthermore, the Forest Service should consider whether or not there are watershed restoration activities, such as road decommissioning, that could be implemented in Horse Creek to move watershed conditions from Condition Rating 2 to Condition Rating 1. Horse Creek is a tributary of Meadow Creek, which is critically important from a fisheries perspective for reasons that the Forest Service is aware. Any opportunities to improve watershed conditions in Horse Creek should be given serious consideration because restoration work implemented in Horse Creek would also likely benefit Meadow Creek and its fisheries.[comment end]

Wildlife

[comment:6-9(143 Wildlife/Animals Mgmt)]The proposed action states that there is no habitat for candidate, threatened or endangered species within the project area. This is an oversight. There is suitable habitat for grizzly bears in the project area. There are at least two confirmed occurrences of grizzly bears on the Nez Perce-Clearwater National Forests in recent years. In 2007, a grizzly bear was mistakenly shot in Kelly Creek on the North Fork Ranger District, and in 2019, a collared grizzly bear ventured into the Selway-Bitterroot Wilderness. A possible third grizzly bear was photographed on a game camera in the nearby Newsome Creek Drainage. Accordingly, the Forest Service should prepare an effects analysis for grizzly bears. Although outside the scope of this project, we also recommend that the Nez Perce-Clearwater National Forests adopt an order for the proper storage of bear attractants on the forest.[comment end]

[comment:6-10(143 Wildlife/Animals Mgmt)]The scoping notice acknowledges that the proposed

vegetation treatments could reduce the effectiveness of elk habitat. The environmental analysis should also disclose whether or not the amount of motor vehicle access within the project area meets Forest Plan requirements for the affected elk analysis units[comment end].

Noxious Weeds

[comment:6-11(141.03 Invasive Vegetation Treatment)]Vehicles and equipment serve as vectors for the spread of noxious weeds when proper inspection and cleaning are not practiced to limit their spread. Disturbed soil should be stabilized and seeded with native vegetation to prevent erosion and expansion of noxious weeds. All equipment should be inspected, cleaned, and washed prior to the operator entering public lands. Work crews trained in noxious weed recognition and removal should patrol the project area and mechanically remove any weeds or trash. The Forest Service should use this opportunity to restore native vegetation, and ICL recommends the use of all native species in the project area, especially areas that have direct associations with temporary roads and/or skid trails.[comment end]